

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Kristy Lee Williams

(Enter above the full name of
plaintiff in this action)

v.

Justice Grown
Justice Cannabis Co.
Oakland Manager LLC

(Enter above the full name of
the defendant(s) in this action)

CIVIL CASE NO: 3:CV22-887
(to be supplied by Clerk
of the District Court) SES

FILED
SCRANTON

JUN 06 2022

PER dw
DEPUTY CLERK

COMPLAINT

1. The plaintiff Kristy Lee Williams a citizen of
the County of LUZERNE State of
Pennsylvania, residing at 433 Chestnut Ave, Kingston, Pa 18704
wishes to file a complaint under _____
(give Title No. etc.)

2. The defendant is Justice Grown, Justice Cannabis Co.
Oakland Manager LLC 7 Gateway Shopping
Center
Edwardsville, PA
18704

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary) _____

3. (CONTINUED) _____

4. WHEREFORE, plaintiff prays that 24 hour surveillance

retrived to prove my timeline
of incidences. You can see when
the male employee grabbed my waist
from behind, Shows security's negligence
clearly. Will show patient reaching under
plexi glass to touch my hand after
reporting multiple times of sexual comments
I am praying that someone and harassment,
will help me get Justice.

Krist Lee Williams
(Signature of Plaintiff)

EEOC STATEMENT OF PARTICULARS:

In re: Kristy Williams v. Oakland Manager LLC d/b/a Justice Cannabis Co. and Justice Grown

The Complainant alleges that prior to and continuing until on or about May 23, 2021, the Respondent, through its agents, servants and employees, subjected her to a hostile work environment through a series of instances of severe and pervasive sexual harassment. The Complainant further alleges that Respondent retaliated against her for opposing unlawful sexual harassment in the workplace, ultimately resulting in the termination of her employment on said date. The facts in support of these allegations are as follows:

- (a) The Complainant, a thirty-five (35) year old female, was employed by the Respondent from on or about October 28, 2020 until on or about May 23, 2021, the date of her unlawful termination.
- (b) Throughout her employment with Respondent, Complainant held the position of Patient Care Advocate. At all times relevant hereto, Complainant maintained an excellent job performance rating in said capacity.
- (c) Beginning in or about December of 2020, the Respondent, through its agents, servants and employees, subjected the Complainant to a hostile work environment through instances of severe and pervasive sexual harassment.
- (d) By way of example, on or about December 21, 2020, Richard Potsko ("Potsko"), Security Guard, observed Complainant sanitizing Respondent's lobby and remarked that he "need[s] a maid to come to [his] house." On the same date, Complainant applied hand lotion and offered some to Potsko. Potsko replied, "I'll make sure I use this in the bathroom. Aren't I raunchy?" thereby stating his intent to masturbate in the workplace. Potsko again suggestively stated to Complainant that he needed a "maid" in his home.
- (e) On the same date, Complainant registered a complaint of sexual harassment with Kimberly Challenger ("Challenger"), Manager, and Martine Hamblen ("Hamblen"), Executive Vice President, in connection with Potsko's sexually suggestive and offensive comments. Challenger and Hamblen dismissed Complainant's allegations, failing to conduct an investigation or take remedial action. Rather, Respondent retaliated against Complainant for opposing

unlawful sexual harassment by sending her home without pay for the remainder of her shift. Challenger and Hamblen did not similarly punish Potsko.

- (f) On or about March 5, 2021, as further harassment, Potsko pursued Complainant in a romantic fashion by inviting her, via email, out on a lunch date.
- (g) As further sexual harassment, on or about May 21, 2021, Dreynell LNU ("Dreynell"), Security Guard, approached Complainant from behind and groped her waist. Complainant broke away from Dreynell's grasp and demanded that he not touch her again. On the same date, Complainant registered another complaint of sexual harassment with Lucretia Holgate ("Holgate"), Supervisor. Upon information and belief, Holgate failed and refused to investigate Complainant's allegations or pursue remedial action in connection with her complaint.
- (h) Respondent additionally failed to protect Complainant from severe and pervasive sexual harassment by patients. By way of example, Patient B.R. ("B.R."), regularly made comments about Complainant's appearance, including calling Complainant "sexy" and stating that he "love[s] [Complainant's] legs." In or about late April of 2021, Denise LNU ("Denise"), Patient Care Advocate, overheard B.R. remark that he wanted to "rape [Complainant]." Significantly, B.R. is the cousin of Bronwyn Perrins ("Perrins"), Supervisor. Upon observing B.R.'s harassment of the Complainant and her resultant distress, Perrins laughed and mocked Complainant each time B.R. entered Respondent's location thereafter.
- (i) On another such occasion, on or about April 27, 2021, Patient S.T. ("S.T."), entered Respondent's location within two (2) minutes of closing time. S.T. followed Complainant throughout Respondent's location, stared lasciviously at Complainant's buttocks, and made sexually suggestive comments, including, "How did you get in those jeans?" and "Let me see that face, pull down your mask." During the course of said harassment, Ken LNU ("Ken"), Security Guard, sat in a closed office, thereby failing to perform his duties at his post in Respondent's lobby.
- (j) On the same date, Complainant registered another complaint of sexual harassment with Holgate, specifically reporting sexual harassment by Patients B.R. and S.T. and Respondent's failures to protect her therefrom. Holgate failed to investigate Complainant's allegations and likewise failed to take steps to prevent B.R. and S.T. to enter Respondent's premises or otherwise cause the harassing treatment to cease. As a result, the sexual harassment persisted.
- (k) In or about early May of 2021, B.R. approached the Complainant and grabbed then attempted to romantically hold her hand. Complainant immediately protested B.R.'s advance and withdrew her hand from his grasp.

- (l) On or about May 19, 2021, Complainant relocated supplies from a low shelf to a more accessible location so as to avoid bending over to retrieve them in the presence of individuals who have harassed her, including Potsko, Dreyne, B.R., and S.T. Andrew Greenwald ("Greenwald"), Manager, demanded that Complainant return the supplies to their former location notwithstanding her explanation as to why she moved them. Complainant promptly complied and returned the supplies. Despite this, and in retaliation for protesting unlawful sexual harassment in the workplace, Greenwald issued Complainant written discipline for the incident.
- (m) On or about May 22, 2021, Respondent hired Caitlin LNU ("Caitlin"), to serve in the position of Patient Care Advocate. On the same date, Complainant warned Caitlin about her experiences of sexual harassment by Respondent and Respondent's patients.
- (n) The next day, on or about May 23, 2021, Robert Garcia ("Garcia"), Pennsylvania General Manager, terminated Complainant's employment, allegedly because Complainant clocked in for her shift from Respondent's parking lot. Significantly, Complainant had clocked in from the parking lot throughout her tenure of employment and, at no time prior to her termination did Respondent counsel or discipline her for doing so. In fact, on numerous occasions prior to her complaints of sexual harassment, Allison LNU ("Allison"), Manager, adjusted the timecards of Complainant and other employees to accommodate instances of forgetting to clock in and out without incident. Moreover, other similarly situated employees, including, but not limited to, Holgate, Challenger, Perrins, Denise, Doug LNU ("Doug"), Patient Care Advocate, Joe G. ("Joe"), Patient Care Advocate, Dan LNU ("Dan"), Patient Care Advocate, and Craig Kocher ("Kocher"), Patient Care Advocate, likewise clock in for their shifts from Respondent's parking lot.
- (o) Complainant believes and avers that no legitimate business reason existed for her termination and that Respondent actually terminated her employment in retaliation for opposing unlawful sexual harassment in the workplace.

WHEREFORE, the Complainant believes and avers that the actions of the Respondent were discriminatory and retaliatory in nature, in violation of Title VII of the Civil Rights Act of 1964 and 1991, as amended ("Title VII"), and the Pennsylvania Human Relations Act ("PHRA").

I was hired October 28th 2020 With Justice Cannabis Company formally Justice Grown. I really loved my job and working with the patients. I always showed up for work. I worked overtime for them because they were so short staffed. I went above and beyond for this company. I cleaned up a patients bodily fluids, aided a patient when they had a seizure in the building, and I cleaned the toilet everytime I used it because people would make a mess of the toilet and expect me to clean it. There was mouse poop in the fridge. Etc.. I'm deeply hurt by their negligence to keep me safe while at work. I feel like they took a piece of my pride that I cannot get back. I feel used and abused. I am an attractive woman but just because im pretty doesn't give anyone the right to harass me. Unfortunately, I came in contact early on in my employment with a few patients and the security guard that would make me feel uncomfortable and say inappropriate things to me. One employee actually grabbed my waist from behind and said "boo". This continued almost on a daily basis. Instead of banning or confronting patients of their inappropriate behavior, they came up with a plan to warn me everytime Brian Roccograndi/certain patients came in. They would send him to his potential next victim instead of refusing to serve him. Everyone would joke, especially the security guards and say "Kristy your boyfriend is here." The day Richard Potsko (security) sexually harrassed me was Dec 21, 2020, which was my birthday. They sent me home and let him finish his shift. They were very understaffed during this time and had no one to cover his shift. So to make it ok they sent me home. He still currently works for them. Draynell is a new employee that grabbed my waist area from behind on May 21, 2021. He is still working for them as well. March 5, 2021 ,Richard Potsko emailed me even though he was told to leave me alone. They wanted me to talk to him about the incident and I refused. I did not want to see him again. This business focuses daily on meeting monetary goals. They ignore patients needs and treat employees like they don't matter. I never received my 90 day evaluation, I had no reach out from human resources about my complaints, and no one showed any concern or offered to help me rid my work environment of sexual abuse. They wanted repor. They wanted me to go faster. Lines would be around the building and they would put the money first before taking care of employees/patients. I have literally cried to them about my frustration. They would say go smoke a cigarette and calm your anxiety down. They said I need to get a hold of it. My feelings and actions were valid and ignored. They want you to get good reviews. I got plenty and they loved that. I felt like bait to make these men come back to buy more. 15 dollars an hour isn't enough to be used and abused by them. I was unappreciated and ignored. It wasn't happening to them so they just ignored it. Some of the other employees would tell me to stop being so nice then they will stop. Denise (PCA) said she heard Brian say under his breath he wanted to rape me. I wasn't able to clarify myself buy she really thought that's what he said. Doug (PCA)knows about looking out for me. He knew I was being harrassed. Joe G (PCA)as well knew of Draynell grabbing me and saying boo from behind. Bronwyn is a supervisor there and Brian the patient is her cousin. She laughed at it everytime he came in. She would say I know he is a weird one. He also gave me a little trinket when he came in. A little doll like thing. I took it because I didn't want to be rude. I put it on my station to be nice. They next day or two while working I looked at it and it gave me the creeps and made me think of him. I threw it away in the garbage. Within the 7 months working for them I only called off one time and that was the day after Shantae Thomas came in and sexually harassed me at the end of the night. Ken the security guard had his door to his office shut at 6:00 p.m. probably on YouTube or looking for his next vacation spot on his computer. During this time our building should be closed or almost closed . I was on the sales floor by myself. The other employees were in the back finishing up . Because of Ken not having that door open and not paying attention to what was going on, Shantae Thomas was given the opportunity to sexually harass me. He should of had his door open and be out on floor to make sure he isn't robbing me or harassing me. Afterwards, I went right in the back and told the Lucrezia Holgate that I'm sick and tired of Brian Roccograndi and Shantae Thomas. She wrote their names down and told me she would report it to Robert who is the general manager. Robert never even mentioned anything about helping the situation. They made sure to write me up for all my little mistakes. They had no intention of solving it other than getting rid of me. While I was on vacation they staffed up and didn't need me anymore. When I came back and Draynell

grabbed me, Robert never addressed it. He made sure to fire me though. I asked before they escorted me out of the building if I can have the sexual harassment documents and all other employment stuff. He refused and said if I ever can get a lawyer for this then he will give that to me. I cried multiple times while at work. There is so much to this story that I don't even know when it started and when it ends.

I'll give you a little back story of me and my mental health. My husband is a veteran and while we were stationed in Virginia, I started to experience some pretty severe symptoms that rendered me disabled. I had multiple stays in mental hospitals due to no fault of my own. My husband had to be honorably discharged on March 13, 2020 due to my mental health and we moved back to Pennsylvania. The past couple years I've been working really hard on living a happy and healthy life. I had gone to group therapy/partial hospitalization for over a year to prepare me to go back out to work and live a normal life. With the help of God, doctors, therapists and family and friends I was doing great. Justice Grown was my 1st job after my mental health crisis. Because of what I endured and because of the extra stress that was put on me due to being sexually harassed at work and my complaints being ignored, I started experiencing symptoms again during employment and after I was fired. I've been smoking a pack of cigarettes a day and that's not normal. My husband and I have been under a lot of stress as well. We are on a tight budget and my income was very needed. The day that they fired me, I came home crying and I called the local police to see if there is anything that I can do about the patients and the security guard at Justice Grown. They made a note of it for me and felt really bad about what happened. They encouraged me to call a lawyer. Also that day, I ended up calling the crisis center and reaching out to them to let them know how I'm feeling. I've had to increase my medicine and my family and my friends have experienced the stress and anxiety of me having another depressing/manic episode. On Memorial Day I was showing signs of psychosis. I became religiously preoccupied and my diagnosis is bipolar type 1 in addition to schizoaffective disorder. I drove at 3am to the cemetery in Washington DC to read the Bible to them. I have a link to the article that was in the paper. Thank God we know my warning signs to make sure I'm able to still function and get the help I need. My husband checks in with my doctor to make sure I'm doing ok. During very stressful times certain things can trigger your body to go into a deep depression. I am still struggling with feeling better that is why it took me so long to write this. I've been in contact with my doctor and therapists and family and friends to help me through this time. There is a lot I will try my best to break it down.

List of people involved or have knowledge of this happening

Robert Garcia- General store manager for Pennsylvania locations. He is who fired me and neglected everything. He is a new hire from California has no clue what he is doing.

Allison Lucarelli- pharmacist she is the one that told me about the plan to send patients to someone else instead of me. Also she was part of an insubordination write up after I moved bags so I didn't have to bend down and have patients looking at my butt more than they already do. She also would tell me I need to get my anxiety down. She would send me home when I got stressed. I also made her aware of my medication change and I apologized to her for getting so upset even though I was just reacting to my environment.

Andrew Greenwald- Dickson City manager he was covering since my old manager Kim quit because of her own reasons. The first day back from vacation I got upset and asked them if I can move the bags back to where they usually are because I don't want patients looking at my butt when I bend down. I apologized right away for me being so Assertive. Since we pull out the orders at night to put away, I put them back on the shelf because it's easier for everyone. Andrew was very condescending and said stop complaining about doing more work. He and Allison had me written up for that on May 19, 2020

Lucrezia Holgate supervisor April 27th after Shauntee Thomas sexually harassed me I went in back and told her I was so sick of it. She wrote their names down and told me she will tell the higher ups. She is also the one who stood on other side of wall on May 22 to see if Brian would do anything to the new girl Caitlyn. He did make comments about her ring and other questions. Also I warned Caitlin of what can happen and what I've experienced and everyone heard that. Also Sat. May 22 asked her if she told Robert and she said she did.

Bronwyn Stevison supervisor cousin of patient Brian Roccograndi she knew of encounters and never addressed his behavior. She was there when he gave me that weird trinket.

Ken- security on duty April 27th when Shauntee Thomas was givin the opportunity to harass me. I asked him after where was he. I said you should have been there paying attention. He said shit happens.

Kimberly Challenger Edwardsville former store manager she did the write up with me for Richard Potsko her and Martine Hamblen sent me home that day. After sending me to my car to calm down. Martine called me while in my car to talk about the incident and asked me to come in and sit down and talk to Richard Potsko about it. I refused and was sent home.

Martine Hamblen former Executive vice president he was fired. I don't know why.

Jenn Domzalski pharmacist knew of incidents never spoke about it to me.

James Touey security he would warn me when Brian was coming in. Also he would send Brian to a different register, he came out on the floor to deter him and failed. Brian walked over to grab my hand and succeeded. He apologized for not stopping him.

Edward -security also always on the computer instead of paying attention. He knew of the redirecting of patients because of my complaints all security was briefed on sending the harrasment to other employees probably because I complained and they didn't or afraid to.

Ray -security also would try to send them to other register and warn me when the patients would come.

Joe G PCA great kid. He knew of it all and supported my feelings. He was present when Draynell grabbed me.

Doug PCA great guy he would say don't worry. Me and Joe will protect you.

Denise PCA knew of Brian and Shauntee. She would tell me to stop being so nice to them. She also was the one to hear Brian mumble he wanted to rape me.

Caitlin PCA new hire. I warned her of the abuse and right after, she was exposed because Brian when he came in that day. Lucrezia stood on other side of the wall to listen if he was going to do it to her. He did ask about her wedding ring and other questions I'm not sure of.

Dan PCA he also would look out for me. He knew of what was going on.

Connie Bertussi EVP human resources no contact with her at all since hired. I don't even think we spoke at all about anything.

I also fell off a desk chair in office and I broke it half. I fell and hit my head and back. Everyone treated it like a joke and no report was written up and I finished my full day shit.

Dec 21 2020 Richard Potsko told me 2 times he needs a maid at his house. I offered him to use my lotion on my station. He took some and while rubbing it in his hands he leaned over and said ill make sure I use this in the bathroom when I go. Then right after he says I know I'm raunchy ain't I. I reported to Kimberly Challenger and was sent home after.

March 5 2021 I brought pizza into work and the left overs I gave to anyone that wanted it. Richard said he has kids at home so I told him to take it and he thanked me and I said your welcome. Later that night he sent me a message on the work email and it said thank you for the pizza ,I owe you a lunch. It was weird because he was told to leave me alone. So why email me? I didn't respond and I deleted it at first and didn't tell my husband. He was already pissed about the Dec incident and the fact he was still working there. I had my husband bring me lunch to try to intimidate him so he won't keep doing it. I have a screen shot of the email.

April 27 2021 Shauntee Thomas patient. He was the individual who came in at closing time and given the opportunity to harass me. He said things like how did I get in those jeans, where I'm from, pull down that mask let me see your face, and when are you leaving here. Alot of patients are on parole and have been incarcerated before. Security should be on point in a place like this and they are not.

April 28th 2021 the one and only day I called off. Noone asked me why or how I was feeling about what happened the night before.

May 19th 2021 I was sent home after moving bags from cabinets to the shelf for easy reach. I assertively told Andrew that that wouldn't work as well as the way it was because patients will look at my butt more because I have to bend down for no reason when there is a shelf in arms reach right behind me. Andrew did not care of my concern. He told me to stop complaining about my job and that I just don't want to do the extra work. I then went up front to tell Alison of my concern and how I apologized for being so upset about it. I ended up crying and they sent me home. This is the day I told them of my medication change. Alison and Andrew both said I need to get my anxiety under control. Me being the person that I am, shook his hand and said sorry. They didn't want me to move the bags but I did so I wouldn't feel uncomfortable bending so low for no reason in plain view for patients.

May 20th I was presented the insubordination write up for moving bags.

May 21st while I was waiting to count my drawer in the office I had my back turned and Draynell who I just met came up behind me like he was my husband and grabbed me and said Boo. I first told him don't touch me. He apologized but at the end of the night I told Lucrezia and she said she will tell Robert.

May 22 2021 this is the day I warned the new girl Caitlyn about what I've experienced and to tell me or supervisor if it happens to her. Later Brian came in. Security gave me a heads up to let me know he is there by saying your boyfriend is here. They did not send him to me instead they sent him to Caitlyn while supervisor Lucrezia listened on other side of the wall to see if he does it to her. They exposed her too. Also on my way to my car after my shift there was a condom wrapper in parking lot on the ground by our cars. It freaked me out and I took a pic.

May 23 2021 showed up for shift and was told that I'm waisting so many minutes of their company time by punching in from car on my way in. I signed the termination paper , cried and asked for all documents concerning me and the incidents. Robert Garcia refused and I then shook his hand and let them escort me out. He did not even mention anything about anything ever. Like I was just floating in the wind for them. He did nothing.

I know this is alot. If anything else that is bothering me I will definitely update you. Please call with questions and clarifications. I'm apologize for the long wait but I was trying to enjoy my holiday weekend with those who value and love me. I currently and experiencing symptoms but I am surrounding by family and going to get

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

☐ FEPA☒ EEOC

CHARGE NUMBER

and EEOC

Pennsylvania Human Relations Commission

State or local Agency, if any:

NAME (Indicate Mr., Ms., Mrs.)

Ms. Kristy Williams

HOME TELEPHONE (Include Area Code)

(570) 885-0045

STREET ADDRESS

433 Chestnut Avenue

CITY, STATE AND ZIP CODE

Kingston, Pennsylvania 18704

DATE OF BIRTH

12/21/1985

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME Oakland Manager LLC d/b/a

Justice Cannabis Co. and Justice Grown

NUMBER OF EMPLOYEES, MEMBERS

15+

TELEPHONE (Include Area Code)

(570) 763-7200

STREET ADDRESS

7 Gateway Shopping Center

CITY, STATE AND ZIP CODE

Edwardsville, Pennsylvania 18704

COUNTY

Luzerne

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))



RACE



COLOR



SEX



RELIGION



AGE



RETALIATION



NATIONAL



DISABILITY



OTHER (Specify)

Sexual Harassment

ORIGIN

DATE DISCRIMINATION TOOK PLACE
EARLIEST (ADEA/IEPA) LATEST (ALL)

05/23/2021



CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

SEE STATEMENT OF PARTICULARS ATTACHED
HERETO

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

Kristy Williams 11-9-21

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)Commonwealth of Pennsylvania - Notary Seal
Jayme Murgallis, Notary Public
Luzerne County

Date Nov 9th 2021 Charging Party (Signature)

My commission expires February 23, 2026
Commission number 1273817

Revised 11/00

**Information For Complainants & Election Option
To Dual File With The
Pennsylvania Human Relations Commission
Kristy Williams v. Oakland Manager LLC
d/b/a Justice Cannabis Co. and Justice Grown**

You have the right to file this charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with the PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you want your charged files with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not investigate it and, in most cases, will accept EEOC's finding. If you disagree with PHRC's adoption of EEOC's finding, you will have the chance to file a request for preliminary hearing with PHRC

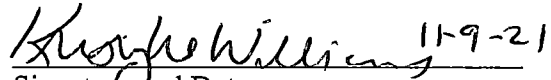
Since you have chosen to file you charge first with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year of filing with PHRC, you have the right to file your complaint in state court. PHRC will inform you of these rights and obligations at that time.

[Sign and date appropriate request below]

I want my charge filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request EEOC to transmit it to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa.C.S. §4909, relating to unsworn falsification to authorities.


Signature and Date

I do not want my charge dual filed with PHRC.

Signature and Date